



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MMO
F. #2022V03577

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 9, 2022

By ECF

The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

The Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. The Real Property and Premises Known as 432 North Oakhurst Drive, Condominium Unit 103, Beverly Hills, California 90210, and All Proceeds Traceable Thereto, et al., 22-CV-7410 (DG)*

Dear Judge Irizarry and Judge Gujarati:

Pursuant to Local Civil Rule 1.6, the government hereby notifies the Court that the forfeiture allegations in above-captioned civil complaint arose out of the same criminal conduct charged in the indictment in the criminal case, *United States v. Andrii Derkach*, 22-CR-432 (DLI).

The civil forfeiture complaint seeks forfeiture of

- (a) The real property and premises known as 432 North Oakhurst Drive, Condominium Unit 103, Beverly Hills, California 90210, together with its, appurtenances, improvements, fixtures, easements, furnishings and attachments thereon, as well as all leases, rents and profits therefrom, and all proceeds traceable thereto;
- (b) The real property and premises known as 432 North Oakhurst Drive, Condominium Unit 203, Beverly Hills, California 90210,

together with its, appurtenances, improvements, fixtures, easements, furnishings and attachments thereon, as well as all leases, rents and profits therefrom, and all proceeds traceable thereto;

- (c) Any and all funds on deposit in Stifel Nicolaus & Co. account number ending in 9142, held in the name of 7D Business Bureau Inc., and all proceeds traceable thereto; and
- (d) Any and all funds on deposit in Citizens Business Bank account number ending in 7135, held in the name of 7D Business Bureau Inc., and all proceeds traceable thereto (the “Defendants *In Rem*”).

The Defendants *In Rem* are also identified in the forfeiture allegations in the criminal indictment. The indictment was returned on September 26, 2022 by a grand jury in the Eastern District of New York, against Andrii Derkach, charging him with: (1) conspiracy to violate IEEPA, in violation of 50 U.S.C. §§ 1705(a) and (c); (2) bank fraud conspiracy, in violation of 18 U.S.C. § 1349; (3) money laundering conspiracy, in violation of 18 U.S.C. § 1956(h); and (4) engaging in monetary transactions in property derived from specified unlawful activity (“SUA”), in violation of 18 U.S.C. § 1957. *See United States v. Andrii Derkach*, 22-CR-432.

Simply stated, the facts underlying the civil forfeiture complaint and indictment are nearly identical. Accordingly, the government is notifying the Court that the criminal and civil cases may be deemed related.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Madeline O'Connor
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